

From: [Stuber, Robyn](#)
To: Brandi.Outwin@waterboards.ca.gov
Subject: tentative order
Date: Friday, March 06, 2015 1:57:00 PM

Hi Brandi,

Please carefully review the RB4 and RB2 permits/fact sheets carefully. Both contain maximum daily and monthly median/average chronic toxicity WQBELs following NPDES regulations. If you've determined RP, one should be included for this permit as well. Also, if you've decided to regulate chronic toxicity, there is probably no reason to include WQBELs for acute toxicity, as chronic is the more stringent endpoint.

Call if you have questions.

Thanks,
Robyn

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From: Lim, Joann@Waterboards [mailto:Joann.Lim@waterboards.ca.gov]
Sent: Thursday, March 05, 2015 12:36 PM
To: Marincola, JamesPaul
Cc: Outwin-Beals, Brandi@Waterboards; Stuber, Robyn
Subject: RE: Tentative Order - Las Gallinas

Based on your comments, I plan on adding the following to the fact sheet (section IV.C.7) and adding an effluent limitation for chronic at A (dechlor to ponds/lakes). Let me know any questions/concerns/edits.

"The previous order required quarterly chronic toxicity tests. Out of 22 chronic toxicity tests, two exceeded 1 TUc. One of those results was 4 TUc (March 2010) and the other was 2 TUc (March 2012). Using the RPA procedures from the SIP, the effluent does have reasonable potential to cause an exceedance of the narrative water quality objective for toxicity and an effluent limitation for chronic toxicity is required."

Parameter	Units	Effluent Limitations					
		Average Monthly	Average Weekly	Maximum Daily	12-Month Average	Instantaneous Minimum	Instantaneous Maximum
Acute Toxicity	Pass/Fail, % Effect (Test of Significant Toxicity)	--	--	Pass or <40% effect ⁵	--	--	--

Chronic Toxicity	Pass/Fail, % Effect (Test of Significant Toxicity)	--	--	Pass or <40% effect ⁵	--	--	--
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From: Marincola, JamesPaul [<mailto:Marincola.JamesPaul@epa.gov>]
Sent: Wednesday, March 04, 2015 4:05 PM
To: Lim, Joann@Waterboards
Cc: Outwin-Beals, Brandi@Waterboards; Stuber, Robyn@epamail.epa.gov
Subject: FW: Tentative Order - Las Gallinas

Hey Joann,

Here's an Order from RB2 that Robyn forwarded over that has some good language on doing a toxicity RPA. It was developed by their attorneys and contains similar rationale to RB4 permits, so should be a good model if you're looking for an example.

Jamie Marincola
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 415-972-3520

From: Stuber, Robyn
Sent: Wednesday, March 04, 2015 3:59 PM
To: Marincola, JamesPaul
Subject: Tentative Order - Las Gallinas